

1 A. That we created internally.

2 Q. And it was the calls that enabled you
3 to retrieve that information that you worked on?

4 A. I did write some of that SQL.

5 Q. And that was the extent of your actual
6 software drafting?

7 A. That's correct.

8 Q. Did you review all the code that went
9 into the project?

10 A. I reviewed most of the window level
11 code. I did not review the code -- I wrote the
12 access past the Oracle. I did not review the code
13 on the building of the file for the EDI
14 component. And I did not code review the service
15 that integrated the CGI.

16 Q. Did you do any review of the CSR part
17 of the project?

18 A. No.

19 Q. Other than what you just described in
20 the description that appears on page 1 of your
21 report, can you elaborate just a bit on what your
22 responsibilities were for this project?

23 A. As it states, I was the project manager
24 providing project leadership, technical mentoring
25 to two individuals that were learning to use our

1 framework. All of my integration with the client
2 was with Alex Dizon and Kathy Wilson-Chu.

3 Effectively, Alex was the co-project
4 manager from a BellSouth side. I issued weekly
5 reports and answered any high-level questions.

6 Q. Who is Kathy Wilson-Chu?

7 MR. ALEXANDER: She's in the room.
8 She's a BellSouth representative.

9 BY MR. O'ROARK:

10 Q. Don't say anything mean about her.
11 What is her role in BellSouth?

12 A. I do not know the answer to that.

13 Q. Do you know what her position is?

14 A. I've read it once on a business card,
15 and I cannot remember it.

16 Q. Do you know whether she works with
17 Mr. Dizon or is in his organization?

18 A. I don't know how the roles mix.

19 Q. For what kinds of information did you
20 call her?

21 A. Talking about project status, becoming
22 aware of, say, a new version, I believe. There
23 was a 2.1 version of the LENS specifications,
24 making sure we got those. Again, very high-level
25 stuff.

1 Q. While we're on the subject,
2 Mr. Runnels, why don't we turn to you for a
3 moment. Let me ask you who your contacts were at
4 BellSouth.

5 BY MR. RUNNELS:

6 A. Primarily Alex Dizon.

7 Q. Did you talk to -- let me put it this
8 way. If you'll look at the last page of the
9 report, if you have that in front of you,
10 Mr. Runnels, there are a list of contacts. And
11 Alex Dizon is listed. Ms. Chu, is that the last
12 name?

13 MS. WILSON-CHU: Wilson-Chu, hyphenated
14 last name.

15 BY MR. O'ROARK:

16 Q. Thank you. Do you see anybody on this
17 list or in the group within this list that you
18 tried to call, Mr. Runnels?

19 A. That I tried to call?

20 Q. Yes.

21 A. Yes. I tried to call everyone in that
22 group.

23 Q. Was there anybody that you tried to
24 call that you were unsuccessful in reaching?

25 A. Karen Johnson is listed as a secondary

1 LENS technical contact, because there were times
2 when Carol Douglas was unable to return my call.
3 There was a time when I believe she was on
4 vacation.

5 None of these people other than Alex
6 were actually assigned to me. As questions came
7 up during the project, I would ask Alex who I
8 should contact. And I would be given a name.

9 Q. What did you talk to Ms. Douglas
10 about?

11 A. I talked to her about the CGI
12 specifications.

13 Q. Can you be a little bit more specific?

14 A. There were times when there were typos
15 or perhaps certain variable name had been left out
16 or something like that within the CGI specs. And
17 I would call to get from her what should have been
18 in the specs.

19 Q. Was there anybody else at BellSouth
20 that you communicated with about this project?

21 A. The people that are listed under the
22 assigned contacts.

23 Q. What did Mr. Merck talk to you about?

24 A. I was having problems establishing a
25 connection with -- actually establishing a

1 connection to BellSouth. And I talked to
2 Mr. Merck and Mr. Preston Jacquomo. As it turns
3 out, the problems that I was having were due to
4 some errors in my code. And it was not a
5 BellSouth problem.

6 Q. I'm sorry, you say that Ms. Johnson did
7 or did not get back to you?

8 A. Both Ms. Douglas and Ms. Johnson got
9 back to me as needed.

10 Q. And Ms. Johnson also talked to you
11 about CGI specifications?

12 A. Yes.

13 Q. And then how about Mr. Betts? What did
14 you talk to him about?

15 A. He was the developer that Carol Douglas
16 and Karen Johnson -- actually, Carol Douglas gave
17 me his name as someone to contact on the more
18 technical issues. And occasionally, when Carol
19 was not there, I would ask Karen Johnson to
20 contact Mr. Betts if I needed to.

21 Q. What more technical issues did you
22 discuss with Mr. Betts?

23 A. Ms. Douglas was Mr. Betts's -- I'm not
24 sure the exact role, but she was higher up within
25 that organization, so to speak. She was not aware

1 of all of the technical details within the CGI
2 specs. Mr. Betts was an actual LENS developer.
3 So therefore he was familiar with the
4 specifications.

5 Q. Do you recall specifically what issues
6 you discussed with Mr. Betts?

7 A. In most cases, it was typos within the
8 CGI specs. The way that the CGI calls have to be
9 made, as with just about any other type of
10 programming that you do, it has to be exact. If
11 it's not exact, what you get back may be incorrect
12 or you may not get back anything at all.

13 So I would call to make -- to verify
14 certain things. There were a couple of cases
15 where certain things had been left out, not major
16 pieces of functionality but maybe a certain call
17 that needed to be made. And I would call to get
18 that.

19 Q. Who on this list or otherwise at
20 BellSouth did you talk to about the CSR part of
21 the project?

22 A. I only talked to Alex Dizon and Raymond
23 Betts regarding the CSR.

24 Q. I'll direct this next question to
25 whoever can best answer it. I just wanted to get

1 a rough division of time between Mr. Kumar and
2 Mr. Runnels. There's just a total time given for
3 software consultants. Was it roughly a 50/50
4 split, or did one of you work on the project more
5 than the other?

6 BY MR. BERMAN:

7 A. For that time frame, it's a 50/50
8 split.

9 Q. What do you mean for that time frame?

10 A. Projects just don't end on a date.
11 Mr. Kumar was pulled off the project. I took
12 myself off the project. And Mr. Runnels was only
13 left on the project to perform maintenance to the
14 software while we were completing this
15 documentation.

16 Q. Let me make sure I understand that.
17 You said that you took yourself off the project?

18 A. Basically started scaling myself back.
19 Instead of working two days a week, it would be
20 hours a week.

21 Q. Was this before April 30th?

22 A. No. After April 30th.

23 Q. So some work continued on the project
24 after April 30th. Can you tell me what work you
25 continued to do after April 30th?

1 A. The only work that was done after
2 April 30th was completion of the documentation, I
3 believe Jack had a couple of outstanding issues as
4 he finished the CSR because that was a late
5 request.

6 BellSouth, at that point, was
7 performing acceptance testing on the integration
8 work that was completed.

9 Q. What is acceptance testing?

10 A. There were running it.

11 Q. Trying to see whether it worked or not?

12 A. Were they happy with it, did it perform
13 what they wanted it to perform. I believe also at
14 that time was when BellSouth had an auditor come
15 in. And I think Jack worked with -- talked with
16 the auditor.

17 Q. Who was the auditor?

18 A. I don't know.

19 Q. Mr. Runnels, do you know?

20 BY MR. RUNNELS:

21 A. His name was Christopher Weissman, I
22 believe was the name. He was a consultant from
23 Ernst & Young, contracted by BellSouth to
24 independently audit the validity of the
25 application.

1 Q. Do the hours that are reflected here
2 under the time heading on page 1 only reflect time
3 spent through April 30th?

4 BY MR. BERMAN:

5 A. Do the hours?

6 Q. Yes. Do you see the hours I'm
7 referring to on page 1 of the report?

8 A. Yes.

9 Q. Are those all the hours that anyone
10 ever spent on the project or just the hours from
11 February 24th through April 30th?

12 A. That was all the hours between those
13 dates to complete the integration.

14 Q. Did Albion charge for its time after
15 April 30th?

16 A. Yes.

17 Q. Do you know how much more it charged?

18 A. The total invoice is \$140,000 and
19 change.

20 Q. Did that include any license fee?

21 A. No license fees. That was the drawdown
22 of myself and the other consultant, working on
23 completing this documentation. The documentation
24 itself was outsourced, so there's the technical
25 writer.

1 Q. What do you mean the documentation
2 itself was outsourced?

3 A. Effectively, Albion completed the
4 documentation, and we had a technical writer in
5 and make it look pretty.

6 Q. When you say make it pretty, are we
7 referring to this Exhibit 1?

8 A. That's correct.

9 Q. You all roughed it out, and then a
10 technical person came in to make it look nice. Is
11 that fair?

12 A. It was not roughed out. We
13 completed -- all of the wording that you read in
14 here, we completed.

15 Q. And why did they need a technical
16 writer?

17 A. We were not professionals at Microsoft
18 Word.

19 Q. So it was strictly a formatting
20 function?

21 A. Yes.

22 MR. ALEXANDER: Nor am I.

23 BY MR. O'ROARK:

24 Q. All right. So going back to what led
25 me down that path, of this 837 hours shown for the

1 two software consultants, do you think that was
2 divided pretty evenly between Mr. Runnels and
3 Mr. Kumar?

4 A. That's correct.

5 Q. Mr. Runnels, do you agree with that?

6 BY MR. RUNNELS:

7 A. Yes.

8 Q. But then after April 30th, Mr. Kumar --
9 or at some point on or about April 30th, Mr. Kumar
10 dropped off the project. And after that,
11 Mr. Runnels probably had the lion's share of the
12 time?

13 BY MR. BERMAN:

14 A. After April 30th.

15 Q. And just so I'm clear, the work after
16 April 30th involved writing this report, working
17 with the auditor, working on acceptance testing?
18 It included at least those things, didn't it?

19 A. Yes.

20 Q. Did it include anything else?

21 A. I believe after April 30th, Jack
22 completed the CSR functionality, the requirement
23 that was added right before April 30th.

24 Q. Well, Mr. Runnels, let me turn to you
25 on that one, because I think you said that you got

1 the CSR assignment about a week before April 30th,
2 something like that.

3 MR. ALEXANDER: Let me -- just for
4 clarification, I think Mr. Berman said --

5 MR. BERMAN: I said that.

6 MR. ALEXANDER: -- the last week of the
7 assignment. I think Mr. Runnels actually said a
8 few days before the assignment.

9 BY MR. O'ROARK:

10 Q. Okay. Thank you for that. Well, let's
11 ask the witness since he's here. When did you get
12 the CSR assignment?

13 BY MR. RUNNELS:

14 A. It wasn't actually an assignment, in
15 the respect that the other functionality that we
16 were provided was. We were contracted to show the
17 integration of the pre-order CGI interface and the
18 firm order EDI-PC interface along with our own
19 internal -- as we were mimicking the CLEC, our own
20 internal business functionality.

21 And the CSR essentially was kind of
22 thrown in as we had time. Alex had mentioned to
23 me -- I can't say that it was a week before the
24 30th. I don't remember the date. Alex had
25 mentioned to me if we have time it would be

1 something nice to do. And I worked on it. I
2 didn't work on it until probably a few days before
3 I ended my time with the project.

4 Q. You do recall that you got the request,
5 we can call it that, before April 30th?

6 A. I don't recall the exact time, no.

7 Q. Do you recall that you worked on it
8 sometime after April 30th?

9 A. Yes.

10 Q. Do you recall when you finished your
11 work on that?

12 A. I don't recall. I don't recall exactly
13 when I finished it, no.

14 Q. Was it sometime in May?

15 A. Oh, yes.

16 Q. How many days did you spend on the CSR
17 part of it?

18 A. Probably spent about three days total.

19 Q. Mr. Berman, let me ask you a couple of
20 questions about due dates. One of the
21 functionalities, I think it's described in your
22 report. Starting at page 5, you'll see there's a
23 reference to the installation calendar.

24 I gather that in the pre-order mode
25 with OPII, all you can do is view the installation

1 calendar, not calculate a due date; is that
2 right?

3 BY MR. BERMAN:

4 A. In the pre-order stage, that is
5 correct, you can only view.

6 Q. Let's talk about the firm order stage,
7 which is discussed on the following page, page 6.
8 As I understand what you've got under the due date
9 calculation heading, a CLEC would enter a due
10 date. And the system would determine whether or
11 not that due date is valid; is that right?

12 A. That's correct. And, Jack, you may
13 want to --

14 Q. Mr. Runnels, do you have anything you
15 want to add to that?

16 BY MR. RUNNELS:

17 A. Only that within LENS, normally the
18 user would enter a due date -- enter a due date
19 that they would prefer. That would go across CGI
20 interface going to BellSouth's internal system to
21 be verified, and information would come back to
22 the user as to whether or not that was a valid
23 date.

24 We saw -- that information -- there's
25 enough information on the screen, in my opinion,

1 to determine what is a valid date. As LENS stands
2 today, if you're told December 1st is invalid, you
3 could still request it.

4 I simply within the application do not
5 allow the user to request a date which is
6 determined to be invalid based on the information
7 that BellSouth has originally sent with the
8 calendar.

9 Q. Does OPII actually calculate a due
10 date? In other words, if could you ask it to
11 calculate the first available due date? I direct
12 the question to either one.

13 A. Again, if you tried to put in a date
14 which was not valid, it would not allow you to do
15 that.

16 Q. Understood.

17 A. The window -- a separate informational
18 pop-up window would come up and say that is not a
19 valid date.

20 Q. But could you ask for the first
21 available date?

22 A. Not within our application. Actually,
23 I'm sorry, I take that back. You have to realize
24 it's been months since I worked on this. I
25 think -- I can't say with certainty, but I think

1 that I defaulted it to the first available date.

2 Q. When you say you defaulted it, what do
3 you mean?

4 A. The due date field. There was a field
5 for the user to enter the due date that would be
6 desired. And that field defaulted to the first
7 available date.

8 Q. And that's what you recall now, but
9 you're not absolutely sure of that?

10 A. I can't say that with certainty, but I
11 know I have a default date in there. And I'm
12 pretty sure that it was the first available date.

13 Q. And again, searching your memory, do
14 you show available alternative dates?

15 A. Alternative dates are dates which
16 are -- you are shown which dates you can't do it.
17 Available dates would be those dates which aren't
18 shown.

19 Q. Yes, but there are also intervals and
20 other things you have to calculate; right? In
21 other words, does OPII show you a list of all the
22 dates available for the service requested?

23 A. The list is would be really long to
24 show every date in a year that it's available to
25 request service. It's a lot more efficient to

1 show those dates which are not allowed.

2 Q. But please do answer the question
3 though. Is it true that OPII does not list the
4 available due dates for the service requested?

5 MR. ALEXANDER: I'm going to object to
6 the question. I think the witness has answered
7 the question. The question presumes that he has
8 not. I think he clearly said how you show that
9 shows dates are not available. And every other
10 known date is available. I think he has answered
11 it.

12 MR. O'ROARK: Mr. Runnels, because this
13 is a deposition, Mr. Alexander has made his
14 objection for the record.

15 MR. ALEXANDER: And I would ask you to
16 rephrase. He's already asked and answered.

17 MR. O'ROARK: You can't direct this
18 witness not to answer a question.

19 (A discussion was had off the record.)

20 BY MR. O'ROARK:

21 Q. The question simply is whether OPII
22 lists the available due dates for the requested
23 service.

24 A. Again, I would say it does not list the
25 available due dates, but from the information that

1 is displayed, it can easily be determined which
2 dates are available.

3 Q. Okay.

4 (A short recess was had.)

5 Q. Let's talk about CSRs for a little
6 while. Mr. Berman, on page 4 of your report under
7 order processing, it says that order processing is
8 the primary function of the application.

9 Actually, I think, as we've already
10 heard, would it be fair to say that obtaining CSR
11 though is a secondary function of the application;
12 is that right?

13 BY MR. BERMAN:

14 A. That's correct.

15 Q. Is that because you don't need CSR data
16 for an order for new residential service?

17 A. That's correct.

18 Q. Can you explain briefly why it is you
19 don't need CSR data for new residential --

20 A. Because it's a new order. The
21 application itself takes in that as input. All of
22 the information, validating the address, reserving
23 the phone numbers, etc., all that's input into the
24 new order. So the expectation is that there will
25 not be an existing record to look at.

1 Q. I'm going to try this first with you,
2 Mr. Berman. And we may have to go to
3 Mr. Runnels. But is it fair to say that, as
4 currently structured, what OPII does is permit a
5 user to view a CSR?

6 A. It only allows a user to view a CSR.

7 Q. And Mr. Runnels let me flip it to you.
8 Do you agree with that assessment?

9 BY MR. RUNNELS:

10 A. Yes.

11 Q. Did Albion attempt at any point to
12 develop its software so that a user could do more
13 than view a CSR?

14 BY MR. BERMAN:

15 A. No.

16 Q. Mr. Runnels, I'll ask you the same
17 question.

18 BY MR. RUNNELS:

19 A. No.

20 Q. Looking at page 8 of the report,
21 Mr. Berman, are you familiar enough with the CSR
22 part of this to discuss the CSR functionality? To
23 the extent you're not, tell me and I'll ask
24 Mr. Runnels, because I know he was more directly
25 involved.

1 BY MR. BERMAN:

2 A. Mr. Runnels was directly involved with
3 this.

4 Q. Let me ask Mr. Runnels. And then I'll
5 ask if you can follow up. Mr. Runnels, what does
6 it mean to view only a CSR?

7 BY MR. RUNNELS:

8 A. Exactly that. Someone within a CLÉC
9 may want to view an existing service record for a
10 customer. So that user would input -- I believe
11 it's the telephone number and the state or
12 region. And the CSR -- the customer service
13 record would be returned via the CGI interface.

14 Q. What use of the CSR data can a user
15 make other than simply using the data?

16 A. In our application, none.

17 Q. Would you agree with me that CSR data
18 is transmitted via LENS in an unbroken string of
19 80 characters per line?

20 A. I don't know that it's 80 characters
21 per line.

22 Q. Would you agree that it's transmitted
23 via LENS in an unbroken string of characters of
24 some number per line?

25 A. Yes.

1 Q. And would you agree with me that to be
2 able to use that data, it's important to break
3 down or parse the data into smaller usable
4 pieces?

5 A. Used for what reason?

6 Q. Let's say if you wanted to use it in
7 connection with ordering.

8 A. I don't know at what level you would
9 needs to parse the CSR to create an order.

10 Q. Would you agree with me though that
11 there would have to be some parsing beyond the
12 string of characters that you initially received?

13 A. Yes.

14 Q. Why don't we turn to page 25? That's
15 the screen that shows the CSR. Mr. Runnels, I'll
16 direct these questions to you at least initially.
17 Let's get ourselves oriented a little bit. There
18 are two boxes in the upper left-hand corner of the
19 screen.

20 Do you see those?

21 A. Yes.

22 Q. And I gathered that the user would
23 input the information of those blocks for the
24 telephone number and for the state and city; is
25 that right?

1 A. Actually, the second field, which has
2 the state and the city, Georgia and Atlanta, it's
3 not just -- it's not always city that's associated
4 with that. In some cases, it's broken down. Like
5 for Georgia, for example, it's Georgia, Atlanta,
6 versus Georgia I think it's called out-state or
7 something like that. For others, it may just be
8 the state, like Kentucky.

9 Q. Is it just the phone number then that
10 the user enters?

11 A. Well, the user must select a state.
12 Most of the states that you select would just be
13 selecting the state. There are a couple of
14 instances where you would select the state and the
15 city. Or I think for Florida, there's like
16 northern Florida and southern Florida.

17 Q. Okay. Just so we're clear then, the
18 user would enter the telephone number in the first
19 box. And there may be some kind of drop-down
20 screen from the second box from which the user
21 would enter the information?

22 A. For the state; correct.

23 BY MR. BERMAN:

24 A. Select, not enter.

25 //

1 BY MR. RUNNELS:

2 A. Right. It's not an enterable field.
3 The user must select from a list of available
4 states.

5 Q. Whereas the first box is an internal
6 field?

7 A. Yes.

8 Q. Once those two boxes are populated or
9 filled, what do you have to do to get all this
10 information below to appear?

11 A. The top button on the upper right
12 portion of the window, you can't really -- or at
13 least I can't within the document I'm looking at
14 read what the button says. But I know that it
15 says find.

16 If you click on that button, what will
17 happen is -- and BellSouth was very clear about
18 this. They wanted a window to pop saying are you
19 authorized to view the CSR, just to make sure
20 that, you know, you weren't doing any unauthorized
21 viewing.

22 Also during my testing I made sure that
23 all the phone numbers I was looking at I had the
24 machine do so. At that point, once it's
25 determined that you are authorized to view that

1 CSR, the telephone number and the state are
2 sent -- they're packaged within a call to the CGI
3 server.

4 And if a valid CSR is returned, in the
5 form of hypertext markup language, HTML, it is
6 broken down or parsed into the data elements used
7 to display within the window.

8 Q. Let's talk about those elements. Let's
9 talk about them first in what I'm going to call
10 blocks. I see three blocks on the left-hand side
11 of the screen and one big block on the right-hand
12 side of the screen. And starting from the left,
13 the top block, I take it, is for directory
14 listing; is that right?

15 A. I can't read it. I can't say that for
16 certain.

17 BY MR. BERMAN:

18 A. Does anybody have a better copy that we
19 can seat actual labels? We can't see it.

20 MR. HOPKINS: No, but I might refer you
21 to page 8, talks about it being separated into
22 four different areas, four separate areas.

23 BY MR. O'ROARK:

24 Q. That's actually where I got the
25 information. Mr. Runnels, look at page 8. The

1 last sentence talks about the information being
2 displayed in four separate areas

3 BY MR. RUNNELS:

4 A. Yes. The first area is the directory
5 listing information. The second box would be the
6 directory delivery information, and the third box
7 is the billing information.

8 Q. That's going top to bottom?

9 A. That's going top to bottom.

10 Q. And the information at the right is
11 service equipment remarks?

12 A. That's correct.

13 Q. And it appears to me -- let's talk
14 about the three blocks to the left. It appears to
15 me that you've divided the information into three
16 lines of data; is that right?

17 A. That is correct. There is also a check
18 box for whether or not the listing is to be
19 published.

20 Q. Okay. As we sit here today, can you
21 say that OPII can consistently parse CSR records
22 at this line level of granularity?

23 A. I tested this with four or five
24 numbers. I did not -- I don't know that it would
25 always parse to that degree.